

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

FILED

DEC 06 2016


CLERK

UNITED STATES OF AMERICA,

CR 16-40125-KES

Plaintiff,

SUPERSEDING INDICTMENT

vs.

KIDNAPPING

18 U.S.C. § 1201(a)(1)

JON HENRI BRYANT, SR.

CARJACKING

18 U.S.C. § 2119(2)

Defendant.

INTERSTATE DOMESTIC VIOLENCE

18 U.S.C. 2261(a)(2)

The Grand Jury charges:

COUNT I

On or about the 25th day of October, 2016, in the District of South Dakota and elsewhere, Jon Henri Bryant, Sr., did willfully and knowingly seize, confine, inveigle, decoy, kidnap, abduct, and carry away for ransom, reward, revenge, and otherwise Christine Emma Woods, and did transport in interstate commerce Christine Emma Woods, in violation of 18 U.S.C. § 1201(a)(1).

COUNT II

On or about the 25th day of October, 2016, in the District of South Dakota, the defendant, Jon Henri Bryant, Sr., with the intent to cause death and serious bodily harm, took a motor vehicle, a silver Oldsmobile Alero, that had been transported, shipped, and received in interstate commerce, from Christine Emma Woods by force, violence, and intimidation, resulting in serious bodily

injury that caused a substantial risk of death, extreme physical pain, and protracted loss and impairment of the function of a mental faculty to Christine Emma Woods, in violation of Title 18, United States Code, Section 2119(2).

COUNT III

On or about the 25th day of October, 2016, in the District of South Dakota and elsewhere, the defendant, Jon Henri Bryant, Sr., did cause Christine Emma Woods, a dating partner, as defined at 18 U.S.C. § 2266(10), to travel in interstate commerce by force, coercion, duress, and fraud, and in the course of and as a result of that conduct, did intentionally commit and attempt to commit a crime of violence, that is, an assault or attempted assault by beating and strangulation of Christine Emma Woods, all in violation of 18 U.S.C. §2261(a)(2) and §2261(b)(2).

A TRUE BILL:

NAME REDACTED

Foreperson

RANDOLPH J. SEILER
United States Attorney

By: 